

STATE OF ILLINOIS)
) SS.
COUNTY OF LEE)

AFFIDAVIT

I, Rick Webster, Register I.D. No. N-46126, a WHITE prisoner incarcerated at the Dixon Correctional Center, in Dixon, Illinois, being first duly sworn on oath, deposes and states that all of the facts stated in this affidavit are true and correct based on personal knowledge, and belief. If called to testify, I am competent and willing to testify to the following.

1. That my name is Rick Webster, and my registered I.D. No. is N-46126. I am a incarcerated individual detained at the Dixon Correctional Center, in Dixon, Illinois, where I reside in the South East Cluster minimum security dormitory housing unit 59, cell 04.

2. That on April 21, 2014, Dixon Correctional Center was on lock-down, and early that morning approximately a hundred or so tactical team members (aka Orange Crush), male and female correctional officers from Dixon C.C., and various other institutions throughout the State of Illinois marched into housing unit 59. All tactical team members were dressed in riot attire consisting of helmets with face shield/guard, black leather gloves, combat boots, gripping a 4ft. long solid stick, and NO VISIBLE NAME TAGS.

3. I, and approximately 148 other inmates were all strip searched in housing unit 59, and we were 'ONLY' allowed to put our underwear, shoes, state pants, and state shirt on as we were all handcuffed, lined up and escorted by the tactical team outside in the cold, and to the gym. We were not allowed to put a t-shirt, sweater, hat, or coat on.

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Rick Webster's Affidavit Continues

4. While I, and other inmates were being held in the gym still in handcuffs, we were told and ordered to stand and face the wall, not to look around, and no talking. We had to raise our hand and a tactical team member would come to us. We were also told that we could sit on the floor facing the wall. This is where I, and all other inmates received our breakfast trays as we were all forced to eat on the dirty gym floor in handcuffs.

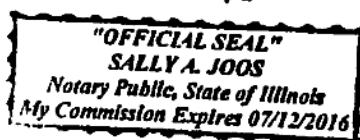
5. After standing for hours, I, and many other inmates were allowed and escorted to the bathroom in the gym. I told the officer at the restroom door that I had to defecate, and may I be uncuffed so I could use the toilet properly, and wipe myself, and wash my hands. The tactical team officer was a WHITE man, and he stated to me Yes, and uncuffed me before I entered the restroom.

6. When I returned to my place in line facing the wall in the gym, I told an inmate next to me that the officer had uncuffed me so that I could use the toilet, wipe myself, and wash my hands properly. Inmate Wade Montgomery, reg. I.D. No.B-77266, was standing on the other side of me and told me that the officer would not uncuff him, and that he had to use the toilet with his handcuffs on, and that he could not wipe himself clean.

Affiant States Nothing Further

Subscribed And Sworn To Before
me This 23rd Day Of May, 2014.

Sally A. Joos
Notary Public



Respectfully Submitted:
/s/ Ricky E. Webster
Name: Ricky E. Webster
IDOC # _____
Dixon Correctional Center
P.O. Box 1200
Dixon, IL 61021

STATE OF ILLINOIS)
) SS:
COUNTY OF LEE)

AFFIDAVIT

I, Michael Hill, I.D.#R-01715, a prisoner incarcerated at the Dixon Correctional Center, in Dixon, Illinois, being first duly sworn on oath, deposes and states that all of the facts stated in this affidavit are true and correct based on personal knowledge, and belief. No one has told me what to say, and I have not been threaten nor coerced in any way. I give my affidavit freely, and voluntarily, and if called on to testify, I am willing and competent to testify to the following.

1. That my name is Michael Hill, with the IDOC#R-01715, and I am a incarcerated individual detained at the Dixon Correctional Center, in Dixon, Illinois, where I reside in the South East Cluster, minimum security dormatory housing unit 59.

2. That on April 21, 2014, the Dixon Correctional Center was on lock-down, and early that morning approximately one hundred or so tactical team officers (aka orange crush), male and female officers from Dixon C.C., and various other correctional institutions throughout the State of Illinois, marched into housing unit 59.

3. All tactical team officers were dressed in riot attire consisting of a orange jump suit, a helmet with face guard, elbow and knee pads, black leather fighting gloves, black belt with pepper spray and handcuffs, black combat boots, and gripping tightly a 4-5ft. solid stick held to the chest. None of the tactical team officers wore a visible name tag.

4. The tactical team officers strip searched me, and all inmates in the housing unit. We were only allowed to put on our state pants, state shirt, underwear and shoes. I, and approximately 130 other inmates were handcuffed, lined up and escorted by the tactical team officers outside in the cold. The wind was blowing and the air was cold, as we were forced to stand outside quietly for some time before we were marched to the gym. The tactical team officers stopped our line in the cold a few times for no apparent reason other than to **RECEIVED**, and to show their superior power and authority.

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affidavit of Michael Hill, idoc#R-01715, continues
housing unit 59
Dixon C.C.

5. We were all escorted in the gym and ordered to line up along the gym walls facing the wall, we were also allowed to sit down facing the wall. We were told not to look around, but to look straight foward, and no talking. We were not suppose to look the officers in their face, only to look straight ahead. If we could not or did not comply with their orders we were threaten with segeration and a major disciplinary ticket, and a possible transfer.

6. After hours of standing the tactical team officers brought our breakfast trays to us, and we were forced to eat standing up or sitting down on the dirty gym floor facing the wall.

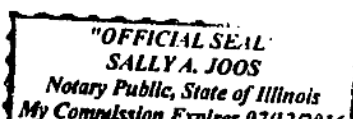
7. Again, and after hours of standing, we were allowed and escorted into the restroom in the gym. I witnessed, inmate Darryl Fleming, IDOC#N-91449, request for this WHITE tactical team officer to uncuff him so that he (Darryl Fleming), could use the toliet, as inmate Fleming stated to the officer that he had to defecate, and needed the handcuffs off to wipe himself properly. The WHITE officer told Fleming, "No, none of the other inmates had a problem with the handcuffs being on for them to take a shit, You are no different". Inmate Fleming went to use the toliet as he told the officer that he could not urinate without defecating also on himself.

8. After inmate Fleming was finish using the toliet we were then escorted back into the gym where we again, stood facing the wall. Inmate Fleming stood nearby in shame, and anger, and I could smell the feces excreteing from his pants.

affiant states nothing further

Subcribed And Sworn To
Before Me This 20th Day
Of May, 2014.

Sally A. Joos
Notary Public



Respectfully Submitted,

/s/ Michael Hill

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Name: Michael Hill
IDOC# R01715
Dixon C.C., P.O. BOX 1200
Dixon, Illinois, 61021

STATE OF ILLINOIS)
) ss:
COUNTY OF LEE)

AFFIDAVIT

I, Artrell Lee, being first duly sworn under oath depose and state that the foregoing is true and correct and made upon my personal knowledge and belief, and no one has told me what say, nor has anyone threaten or coerced me in any way. I give this affidavit freely, and voluntarily, and I am competent to testify thereto.

1. That my name is Artrell Lee, with the I.D.No.M-17871, and I am an incarcerated individual detained at the Dixon Correctional Center, in Dixon, Illinois, where I reside in the south east cluster minimum security dormitory housing unit 59.

2. That on April 21, 2014, the Dixon Correctional Center was on lock-down, and early that morning approximately a hundred or so tactical team officers (aka orange crush), male and females, but mostly men, from Dixon C.C., and various other correctional institutions around the State of Illinois, marched into housing unit 59.

3. These tactical team officers were dressed in riot attire consisting, of a orange jumpsuit, a helmet with a face shield, elbow and knee pads, black fighting leather gloves, black belts with handcuffs and pepper spray, combat boots, and holding a 4-5ft. solid stick held to the chest. None of the tactical team officers that I look at wore a visible name tag.

4. The tactical team officers strip searched me, and my cell-mates, and all the other inmates in the unit. We were only allowed to put on our underwear, state pants, state shirt, socks and shoes. After the strip search approximately 130 inmates, including myself, were handcuffed, lined up and escorted outside by the tactical team officers.

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affidavit of Artrell Lee, continues
idoc#M-17871
housing unit 59
Dixon C.C.

5. We were lined up outside in the cold and the wind was strong and the air blow up and through my state shirt and state pants. I became emotional distraught as I could not prevent my body from shivering from the cold. It made no sense for the tactical team officers to not allow us to wear our hats, sweaters, or coat, knowing they were going to take us out in the cold.

6. The tactical team officers lined us all up outside and had us wait quietly in the cold for minutes before escorting us to the gym building. The officers stopped the line a few times again, forcing us to stand at attention in the cold without proper clothing. However, the tactical team officer were all dressed for the cold weather. This manner of lack of proper clothing, and exposure to the cold weather was a show of their power and authority, as well as their abuse of power and authority, as we were all in compliance.

7. After the tactical team officers escorted myself, and all other inmates into the gym, we were told to stand or sit facing the gym wall, not to talk or look around, and we could not look the officers in the face. My blief, was so we could not identify them. We were threaten with segregation, a disciplinary ticket, and a possible transfer if we could not stand or sit for the duration of the shakedown.

8. After hours of standing we were forced to eat our breakfast trays standing up or sitting down on the dirty floor in handcuffs. Some inmates chose not to eat because of the setting and manner was not proper. Again, hours later we were allowed and escorted to the restroom where I witnessed, inmate Darryl Fleming, I.D.#N-91449, request for this WHITE tactical team officer to remove his handcuff inorder for him to defecate, and wipe himself properly. The officer told Fleming No, and also told him that other inmates had no problem taking a shit with the cuffs on, and you aren't any different.

affidavit of Artrell Lee, continues
idoc#M-17871
housing unit 59
Dixon C.C.

9. Inmate Fleming told the WHITE officer that he could not urinate without defecating on himself, and that he needed to use the toilet, before he defecated on himself. I witnessed Fleming go into the stall to use the toilet, while in handcuffs.

10. After Fleming had finish using the toilet we were all escorted back in the gym where we lined up again facing the wall. It was not long thereafter that I smelled feces, and I knew it was coming from Fleming as he stood nearby.

affiant states nothing further

Subscribed And Sworn To
Before Me This 20th Day
of MAY, 2014.

Sally A. Joos
Notary Public



Respectfully Submitted,

/s/ Artrell Lee

Name: ARTRELL LEE

IDOC# M-17871

Dixon C.C.

P.O. BOX 1200

Dixon, Illinois,

61021.

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